

FILED IN CHAMBERS  
U.S.D.C ATLANTA

Date: Apr 01 2025

KEVIN P. WEIMER, Clerk

By: E. M. Morrell  
Deputy ClerkUnited States District Court  
NORTHERN DISTRICT OF GEORGIA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

Seok Ha Kang

Case Number: 1:25-MJ-336

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 31, 2025 in Clayton County, in the Northern District of Georgia, defendant(s) did, using any means or facility of interstate commerce, transport into the United States at least one visual depiction of minors engaged in sexually explicit conduct,

in violation of Title 18, United States Code, Section 2252(a)(1).

I further state that I am a Special Agent and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes



Signature of Complainant  
Natashya Johnson

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

April 1, 2025

Date

at Atlanta, Georgia

City and State

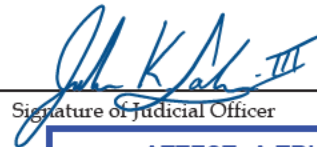
JOHN K. LARKINS III

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Paul Jones

Paul.Jones@usdoj.gov



Signature of Judicial Officer

ATTEST: A TRUE COPY  
CERTIFIED THIS

Date: Apr 01 2025

KEVIN P. WEIMER, Clerk

By: E. M. Morrell  
Deputy Clerk



**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Natashya Johnson, a Special Agent for Homeland Security Investigations within the United States Department of Homeland Security, depose and say under penalty of perjury:

1. This affidavit is submitted in support of a criminal complaint for Seok Ha KANG.

2. As set forth herein, I respectfully submit there is probable cause to believe that on or around March 31, 2025; in the Northern District of Georgia, Seok Ha KANG, a Korean citizen, was encountered at the border, or at an equivalent of a border, of the United States of America. Upon entry into the United States, KANG was found to be in possession of previously downloaded items identified as Child Sexual Exploitation Material (CSAM), in violation of Title 18, United States Code, Section 2252(a)(1).

**Background of Affiant**

3. I certify that I am an investigator and law enforcement officer of the United States within the meaning of Title 8, United States Code, Section 1357(a)(5), that is, an officer of the United States who is empowered to conduct investigations of, and to make arrests for, certain offenses enumerated in Titles 8, 18, 19, 21, and 31 United States Code, and other related offenses.

I am a Special Agent (SA) Criminal Investigator for Homeland Security Investigations (“HSI”). I have been employed by HSI since May of 2022. I am currently assigned to the Office of the Special Agent in Charge, Atlanta, Georgia, Hartsfield-Jackson Atlanta International Airport Group, Border Enforcement Security Task Force (“BEST”). Prior to joining HSI, I was a Federal Air Marshal

and before that I was a local peace officer with the Clayton County Police Department. I am a graduate of the Criminal Investigator Training Program and the Homeland Security Investigations Special Agent Training at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, where I received training in violations of criminal and immigration law as well the preparation and execution of search and arrest warrants. My duties as an agent assigned to Border Enforcement Security Task Force include, but are not limited to, investigations of international drug smuggling, weapon smuggling, import and export investigations, bulk cash smuggling, human smuggling and trafficking, and child sexual exploitation.

4. During my time with the Clayton County Police Department, I worked as an undercover decoy and as an interdiction officer with the narcotics division. During my law enforcement career, I have written and executed search, seizure and arrest warrants pertaining to the seizure of various types of criminal evidence such as illegal drugs, drug paraphernalia, drug records, drug proceeds and evidence of other types of crimes, and arrests of individuals involved in drug trafficking activities.

#### **STATEMENT OF PROBABLE CAUSE**

5. On March 31, 2025, I received information from Customs and Border Protection Officer (CBPO) Escobar regarding a Korean citizen, Seok Ha KANG, who traveled to the Hartsfield-Jackson Atlanta International (ATL) Airport on March 31, 2025. CBPOs encountered Seok Ha KANG as a referral from Primary Inspection. KANG was in possession of a Korean passport, which contained his image, and was printed in the name of Seok Ha KANG.

6. KANG was referred by CBP to the Secondary Inspection area of the F-Terminal of the ATL Airport. During the secondary inspection CBP obtained scans of KANG's fingerprints. The results of this scan showed that the fingerprints were a match to those of Seok Ha KANG, who was previously admitted into the United States as the result of a Visitor Visa. During the Secondary Inspection, CBP conducted a baggage examination.

7. Seok Ha KANG advised he traveled here for work, although he explained that he understood the limitations of his Visitor Visa, which was granted under the Electronic System for Travel Authorization (ESTA) that permits eligibility of visitors to travel to the United States under the Visa Waiver Program (VWP). KANG was determined to be inadmissible in violation of 212(a)(7)(A)(ii) for a non-immigrant operating as an immigrant. As a result, KANG is an Alien Inadmissible under Title 8, United States Code, Section 1182.

8. KANG verified that he is not a United States Citizen by his birth parents' Korean citizenship and his own birth in Korea. KANG openly admitted that he has only entered the United States by ESTA Visa.

9. Upon consensual review of KANG's cellular electronic, agents observed images and videos of minor children engaged in sexually explicit conduct. For example, one video showed a prepubescent female performing oral sex on a prepubescent male.

10. KANG was advised of his *Miranda* rights and waived them. KANG admitted that he did complete the processes for legal admission to the United States. He also admitted that he worked during every previous entry into the United States and that he made \$10/hour.

11. As documented above, KANG, a Korean National, was encountered in the United States on March 31, 2025, and was found to have violated Title 18, United States Code, Section 2252(a)(1), which prohibits knowingly transporting or shipping using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce, any visual depiction, the producing of which involves the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct.